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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

CAMILE GEAR RICH,

Plaintiff

v.

UNIVERSITY OF SOUTHERN  
CALIFORNIA, UNIVERSITY OF  
SOUTHERN CALIFORNIA GOULD  
SCHOOL OF LAW, and the BOARD  
OF TRUSTEES OF THE  
UNIVERSITY OF SOUTHERN  
CALIFORNIA

Defendants

CASE No. 2:25-cv-05842-JFW(JCx)

*Hon. Judge John F. Walter*

*Hon. Mag. Judge Jacqueline Chooljian*

**JOINT RULE 26(F) SCHEDULING  
CONFERENCE REPORT**

Date: January 5, 2026

Time: 1:15 p.m.

Ctrm: 7A

Complaint (with Demand for Jury Trial)

Filed: June 26, 2025

Answer Filed: November 14, 2025

Trial (Proposed): March 1, 2027

1 Pursuant to this Court’s November 20, 2025 Order (ECF No. 26), Federal Rule  
2 of Civil Procedure 26(f) and Local Rule 26-1, Plaintiff Camille Gear Rich and  
3 Defendant University of Southern California (“Defendant” or “USC”) (Plaintiff and  
4 Defendant collectively referred to herein as “the parties”), by and through their  
5 undersigned counsel, respectfully submit the following report:

6 **1. JURISDICTION, VENUE, AND SERVICE**

7 This civil action is brought for alleged violations of Plaintiff’s statutory rights  
8 as guaranteed by Title IX of the Education Amendments of 1972 (“Title IX”), Title  
9 VII of the Civil Rights Act of 1964 (“Title VII”), the Americans with Disabilities Act  
10 of 1990 (“the ADA”), and the California Fair Employment and Housing Act (“the  
11 FEHA”). This Court has original jurisdiction over Plaintiff’s claims pursuant to 28  
12 U.S.C. § 1331 because Plaintiff asserts claims arising under the laws of the United  
13 States. This Court has supplemental jurisdiction over Plaintiff’s state law claims  
14 pursuant to 28 U.S.C. § 1367 because Plaintiff’s state law claims are so closely related  
15 to the federal law claims as to form the same case or controversy under Article III of  
16 the United States Constitution.

17 Venue is proper pursuant to 28 U.S.C. §1391(b)(2) because the alleged events  
18 or omissions giving rise to Plaintiff’s claims occurred in this District. No issues exist  
19 regarding jurisdiction or venue. All parties have been served.

20 **2. STATEMENT OF THE CASE**

21 **a. PLAINTIFF’S STATEMENT**

22 This case arises out of the mishandling of Plaintiff’s reports of harassment,  
23 discrimination, retaliation resulting in her further exposure to such unlawful  
24 behaviors. Plaintiff, a current employee of Defendant as a Professor at Defendant’s  
25 Gould School of Law (the “Law School”), alleges that she formally reported instances  
26 of sexual harassment, discrimination, and retaliation perpetrated against her by her  
27 former spouse, also a professor at the Law School, to Defendant’s supervisors and  
28 Office of Equity and Diversity (“OED”). In response to Plaintiff’s complaints,

1 Plaintiff alleges that OED failed to properly and appropriately investigate her  
2 complaints pursuant to Defendant's relevant and applicable policies and procedures  
3 and Title IX, failed to implement appropriate interim safety measures, such as the  
4 granting of certain disability related accommodations, and showed a bias toward the  
5 Respondent. Plaintiff further alleges that following her formal complaints, she was  
6 subjected to retaliation by Defendant's agents and representatives, including her  
7 supervisor who had been improperly involved in the investigatory process related to  
8 Plaintiff's complaints.

9 **b. DEFENDANT'S STATEMENT**

10 USC has employed Plaintiff as a professor in the Law School since 2007. In  
11 2015, Plaintiff and her then-husband Stephen Rich (who is also employed by USC as  
12 a professor in the Law School) began divorce proceedings that concluded with the  
13 dissolution of their marriage in 2019.

14 On August 23, 2019, Plaintiff made a report to USC's Office for Equity and  
15 Diversity ("OED"), raising concerns that her ex-husband was in a relationship with a  
16 former Law School student, which Plaintiff claimed may have created a hostile  
17 environment for other students if they had knowledge of the relationship, and which  
18 may have violated other USC policies. OED conducted a preliminary inquiry of the  
19 hostile environment concern and, by December 2019, determined there was  
20 insufficient information to engage in its investigatory process. Consistent with its  
21 normal practice, OED then referred the balance of Plaintiff's allegations, concerning  
22 conflicts of interest, to the Law School to review. Then-Dean Andrew Guzman  
23 reviewed those remaining allegations, including meeting with Plaintiff. He concluded  
24 that it appeared from the evidence (including the information provided by Plaintiff)  
25 that the relationship in question began after the former student was no longer a student  
26 at the Law School. He further determined there was no evidence to support a finding  
27 that Stephen Rich had violated USC policy on faculty conflicts of interest.

28

1 In August 2022, Plaintiff made a request to USC for accommodations. USC  
2 granted Plaintiff three accommodations: [1] no assignment to committees with her ex-  
3 husband; [2] an earnest effort to assign Plaintiff to her preferred classrooms; and [3]  
4 approval to use summer research stipend funds for administrative support. At various  
5 times from 2022 to the present, Plaintiff requested that enrollment in her courses be  
6 capped at no more than 50 students. Although USC did not formally grant an  
7 accommodation of a hard cap on enrollment in Plaintiff's classes, as a practical matter,  
8 she has not had more than 50 students in a course since at least Spring 2019. USC  
9 also accommodated Plaintiff with leaves of absence.

10 At this time, Defendant believes the principal factual issues in dispute are the  
11 nature of Plaintiff's disabilities and need for accommodation and whether USC  
12 properly applied its policies and processes in effect at the time of Plaintiff's August  
13 2019 report regarding Stephen Rich.

### 14 3. LEGAL ISSUES AND POINTS OF LAW

#### 15 a. PLAINTIFF'S STATEMENT

16 Plaintiff contends the key legal issues in dispute include:

- 17 • Whether Plaintiff was subjected to a hostile work environment and/or  
18 discrimination on the basis of her gender in violation of Title VII, Title  
19 IX, and/or the FEHA? *See Schwake v. Ariz. Bd. of Regents*, 967 F.3d 940,  
20 946 (9th Cir. 2020); *Reynaga v. Rosebug Forest Prods.*, 847 F.3d 678  
21 (9th Cir. 2017).
- 22 • Whether Plaintiff was subjected to retaliation in violation of Title VII,  
23 Title IX, the ADA and/or the FEHA? *See Weil v. Citizens Telecom*  
24 *Servs., Co.*, 922 F.3d 993 (9th Cir. 2019); *Ray v. Henderson*, 217 F.3d  
25 1234 (9th Cir. 2000).
- 26 • Whether Defendant failed to provide reasonable accommodation to  
27 Plaintiff's known disability. *See Kim v. Santa Ana Unified Sch. Dis't*,  
28 2025 WL 3295590 (C.D. Ca. Nov. 26, 2025).

- Whether Defendant acted with deliberate indifference in its investigation and/or handling of Plaintiff's Title IX and discrimination related complaints under *Davis v. Monroe Cnty. Bd. of Educ.*, 526 U.S. 629 (1999) and *Karasek v. Regents of Univ. of CA*, 956 F.3d 1093 (9th Cir. 2020).

#### **b. DEFENDANT'S STATEMENT**

USC contends the following additional key legal issues are in dispute:

- Whether plaintiff's claims under Title VII, FEHA, Title IX and the ADA are time-barred (*See* 42 U.S.C. § 2000e-5(e)(1); Cal. Gov't. Code § 12960(e)(5); *Karasek v. Regents of Univ. of California*, 534 F. Supp. 3d 1136, 1149 (N.D. Cal. 2021); 42 U.S.C. §§ 2000e-5(e)(1) & 12117(a)).
- Whether any accommodations Plaintiff requested would impose an undue burden on Defendant. 42 U.S.C. §12112(b)(5)(A).
- Whether Plaintiff failed to exhaust internal procedures at USC, and any administrative remedies required under Title VII, Title IX, the ADA, or FEHA.
- Whether Plaintiff's own conduct reduces or precludes her recovery in this action, based on doctrines of estoppel, waiver, laches, and unclean hands, or through a failure to mitigate damages. *See, e.g., FTC v. Directv, Inc.*, 2015WL 9268119 (N.D. Cal. 2015) at \*2-3; *Dollar Systems, Inc. v. Avcar Leasing Systems, Inc.*, 890 F.2d 165, 173 (9th Cir. 1989); Model Ninth Circuit Jury Instruction 5.3 (Damages – Mitigation).

#### **4. MOTIONS**

There are no prior or pending motions. Plaintiff does not anticipate filing any dispositive motions at this time. However, the parties expect to file motions in limine and *Daubert* motions prior to trial, if and as necessary. Additionally, depending on

1 how discovery progresses, the parties may file discovery-related motions should  
2 disputes arise that cannot be resolved informally amongst counsel.

3 At this time, USC anticipates filing a motion for summary judgment or partial  
4 summary judgment after conducting sufficient discovery. USC also anticipates filing  
5 a motion to bifurcate the trial.

## 6 **5. AMENDMENTS AND ADDITIONS**

7 The parties previously stipulated to the dismissal of the defendants University  
8 of Southern California Gould School of Law and the Board of Trustees of the  
9 University of Southern California as improper parties to this Action. (ECF No. 24).  
10 The parties do not currently anticipate or intend to amend the pleadings to add or  
11 withdraw any party or claim.

## 12 **6. INITIAL DISCLOSURES**

13 The parties will exchange initial disclosures pursuant to Rule 26(a) on or before  
14 December 22, 2025. These initial disclosures will identify categories of information  
15 and documents, with the understanding that the actual documents will be produced  
16 subsequently. These disclosures will also identify individuals with knowledge of  
17 information relevant to the parties' claims and/or defenses. The parties are  
18 coordinating the timing of document production following the exchange of  
19 disclosures.

## 20 **7. DISCOVERY**

21 The parties have not yet served Requests for Production of Documents or  
22 Interrogatories but have agreed to a mutual exchange of discovery requests on January  
23 15, 2026. Plaintiff intends to conduct discovery into Defendant's policies and  
24 procedures related to the issues raised in this matter, Defendant's handling of  
25 Plaintiff's formal complaints and the appropriateness of Defendant's response,  
26 Plaintiff's request for reasonable disability accommodations and the appropriateness  
27 of Defendant's response, and Defendant's history, if any, of failure to properly  
28 address complaints related to the issues raised in this matter. Plaintiff further intends

1 to seek to depose individuals who were personally involved in the receipt of Plaintiff's  
2 complaints and investigations thereof, and Plaintiff's requests for reasonable  
3 accommodations. Such individuals include, but are not limited to, Andrew Guzman,  
4 John Jividen, Christine Street, Catherine Spear, Felicia Flores, and Franita Tolson.

5 Defendant intends to conduct discovery into Plaintiff's factual allegations,  
6 Plaintiff's alleged medical conditions and emotional distress (including potentially  
7 seeking an independent medical examination), Plaintiff's alleged damages, and her  
8 efforts to mitigate any harm, and her communications with third parties regarding the  
9 allegations of her complaint. USC anticipates taking the depositions of Plaintiff, her  
10 treating physicians and other care providers, and her expert witnesses, if any.

11 At this time, no modifications to the discovery rules are proposed. The parties  
12 will cooperate to develop any necessary discovery protocol for the use and treatment  
13 of confidential material and the production of e-discovery materials and shall file a  
14 stipulated Protective Order for the court's approval before the deadline for the  
15 exchange of documents.

## 16 **8. RELATED CASES**

17 The parties are not aware of any related matters.

## 18 **9. RELIEF SOUGHT**

19 Plaintiff contends that this case arises from the mishandling of Plaintiff's  
20 reports of harassment, discrimination, retaliation resulting in her further exposure to  
21 such unlawful behaviors. Plaintiff seeks both compensatory and punitive damages,  
22 damages for lost wages, as well as attorneys' fees and costs.

23 Given the nature and gravity of the harm, including Plaintiff's emotional  
24 distress, reputational damage, and lost opportunities, and the continuing nature of the  
25 violation, Plaintiff contends that a precise calculation of damages is not particularly  
26 meaningful at this stage. However, based on the scope and duration of the harm  
27 suffered, which continues to date, Plaintiff estimates that her damages exceed \$1  
28 million.



1 In the absence of discovery and information from Plaintiff concerning the  
2 nature and amount of damages she seeks, it is difficult for Defendant to address  
3 damages at this time. However, USC contends that Plaintiff has a duty to use  
4 reasonable efforts to mitigate her damages (Model Ninth Circuit Jury Instruction 5.3)  
5 and any recovery should be reduced by her failure to mitigate and subject to any  
6 statutory limits on recovery. Further, Plaintiff's claims for emotional distress and lost  
7 opportunities may be the subject of expert testimony. Finally, with respect to  
8 Plaintiff's claim for lost wages, USC contends there have been no lost wages because  
9 she has at all times been employed with USC.

#### 10 **10. CERTIFICATION OF INTERESTED PARTIES**

11 The parties have filed their Certifications as to Interested Parties or Persons in  
12 accordance with the Local Rules (ECF No. 9 and ECF No. 18). At this time, the parties  
13 are not aware of any persons, firms, partnerships, corporations (including parent  
14 corporations), or other entities that have a financial interest in the subject matter in  
15 controversy or in any party to the proceeding, or any other kind of interest that could  
16 be substantially affected by the outcome of the proceeding, other than the named  
17 parties. The parties will file updated certifications if new information becomes  
18 available.

#### 19 **11. PROPOSED CASE SCHEDULE**

20 Completion of fact discovery	September 11, 2026
21 Initial Expert Disclosures	October 2, 2026
22 Last day to file Rule 56 Motion	September 28, 2026
23 Last day to file opposition to Rule 56	October 19, 2026
24 Motion	
25 Last day to file reply in support of Rule	November 2, 2026
26 56 Motion	
27 Rebuttal Expert Disclosures	October 30, 2026
28	



1	Last day to hear Rule 56 Motion	November 16, 2026
2	Completion of expert discovery	December 11, 2026
3	Deadline to complete Settlement	January 7, 2027
4	Conference or other ADR	
5	Trial Filings Part 1 (motions in limine;	January 14, 2027
6	memoranda of contentions of fact and	
7	law; witness lists; exhibit lists)	
8	Trial Filings Part 2 (oppositions to	January 28, 2027
9	motions in limine; joint proposed final	
10	pretrial conference order; disputed jury	
11	instructions; agreed/joint jury	
12	instructions; joint proposed verdict	
13	forms; joint proposed statement of the	
14	case; proposed voir dire questions	
15	Final pretrial conference	February 11, 2027
16	Trial date	March 1, 2027

## 12. TRIAL

Plaintiff requested a jury trial in her pleadings. Based on the claims and anticipated witnesses, the parties estimate that the trial can be completed in approximately five court days.

## 13. SETTLEMENT AND ADR

The parties have not yet engaged in settlement negotiations and do not believe that such discussions would be productive until at least the exchange of written discovery has been completed to allow both sides to engage in any meaningful evaluation of settlement. The parties respectfully request to advise the Court of their preferred method of alternative dispute resolution following completion of the exchange of written discovery.

1 **14. COMPLEXITY**

2 This case does not require special procedure for complex litigation.

3 **15. DISPOSITIVE MOTIONS**

4 Plaintiff does not anticipate filing any dispositive motions.

5 As set forth above, Defendant anticipates filing a motion pursuant to Rule 56.

6 **16. UNUSUAL LEGAL ISSUES**

7 The parties are not aware of any unusual legal issues implicated in this case.

8 **17. BIFURCATION OR SEVERANCE**

9 There are no agreements regarding severance, bifurcation or other ordering of  
10 proof. USC anticipates filing a motion to bifurcate the trial.

11 **18. LEAD TRIAL COUNSEL**

12 Lead Trial Counsel for Plaintiff is Gabrielle M. Vinci. Attorney Vinci's email  
13 address of record is gvinci@nmlplaw.com. Plaintiff is also represented by Andrew  
14 T. Miltenberg of Nesenoff & Miltenberg, LLP, whose email address is  
15 amiltenberg@nmlplaw.com, and Alexander Rufus-Isaacs of Rufus-Isaacs Acland &  
16 Grantham LLP, whose email address is aisaacs@rufuslaw.com. Plaintiff's counsel are  
17 all registered to receive ECF notifications.

18 Lead Trial Counsel for USC is Puneet K. Sandhu, who is registered as a  
19 CM/ECF user; her email address of record is psandhu@psemploymentlaw.com.

20  
21 Dated: December 18, 2025

**NESENOFF & MILTENBERG, LLP**

22  
23 By: s/ Gabrielle M. Vinci  
24 Andrew T. Miltenberg  
25 Gabrielle M. Vinci  
26 *Attorneys for Plaintiff*  
27 *CAMILLE GEAR RICH*  
28

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Dated: December 18, 2025

**RUFUS-ISAACS ACLAND &  
GRANTHAM LLP**

By: s/ Alexander Rufus-Isaacs

Alexander Rufus-Isaacs  
Attorneys for Plaintiff  
CAMILLE GEAR RICH

DATED: December 18, 2025

**PAZZANI & SANDHU LLP**

By: s/ Puneet K. Sandhu

PUNEET K. SANDHU  
Attorneys for Defendant  
UNIVERSITY OF SOUTHERN  
CALIFORNIA

**STATEMENT OF ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 18, 2025

**RUFUS-ISAACS ACLAND &  
GRANTHAM LLP**

By: s/ Alexander Rufus-Isaacs

Alexander Rufus-Isaacs  
Attorneys for Plaintiff  
CAMILLE GEAR RICH

**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2025, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to the email addresses registered in the CM/ECF system.

DATED: December 18, 2025

BY: s/Alexander Rufus-Isaacs/  
Alexander Rufus-Isaacs  
RUFUS-ISAACS ACLAND & GRANTHAM  
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